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Greece

Food and Agricultural Import Regulations and Standards

Country Report

2004

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Report Highlights:

This report provides information to U.S. exporters on labeling, packaging, ingredient contents and other relevant information pertaining to food and agricultural imports into Greece. It also provides points of contacts for Greek government and food laboratories.

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Disclaimer

This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service in Athens for U.S. exporters of domestic food and agricultural products. While every possible care was taken in the preparation of this report, information provided may not be completely accurate either because policies have changed since its preparation, or because clear and consistent information about these policies was not available. It is highly recommended that U.S. exporters verify the full set of import requirements with their foreign customers, who are normally best equipped to research such matters with local authorities, before any goods are shipped. FINAL IMPORT APPROVAL OF ANY PRODUCT IS SUBJECT TO THE IMPORTING COUNTRY'S RULES AND REGULATIONS AS INTERPRETED BY BORDER OFFICIALS AT THE TIME OF PRODUCT ENTRY

SECTION I. FOOD LAWS

Greece as a member of the European Union (EU) follows the EU directives and regulations. Labeling and ingredient legislation for all food and agricultural products is based on EU rules and regulations. It is therefore recommended that U.S. importers read in conjunction with this report the Food and Agricultural Import Regulations and Standards (FAIRS) report produced by the U.S. Mission in Brussels at www.useu.be/agri/usda.html. Nevertheless, Greece maintains specific labeling and ingredient rules for some food products, which are described in detail in the Greek Food Code published by the General State Chemical Laboratory (GSCL). There is no electronic version of the Greek Food Code, a hard copy can be obtained in Greek, from the General State Chemical Laboratory. Thus, it is essential for the U.S. exporters to have a Greek agent with a suitable background, to undertake the clearance procedures. The GSCL is the Greek agency responsible for labeling and product ingredient regulations, and it also performs the laboratory tests for granting importation approval to foodstuffs subject to approval.

The current Food Code was published in 2003 and is amended by a number of decrees to incorporate new legislation. The Food Control Agency (EFET), is responsible for enforcing the regulations and collecting samples from selling points to check compliance with food legislation to ensure food safety and protection of consumer health in accordance with EU Dir 89/397. Locally produced and imported food items are regularly checked by random sampling not only for absence of prohibited ingredients but also in terms of fair trading practices and consumers' expectations, as product label should not mislead or confuse the consumer. Labeling must not make false claims nor should any product present a risk to public health.

Contact information for GSCL and EFET follows:

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Greek Food regulations apply to both domestically produced and imported food products. Imported food and beverage products complying with rules and regulations as would any other product sold in the EU market, require no special permit nor they are subject to special rules or regulation regarding their commercialization in Greece.

If a U.S. food product, other than food supplements, conforms to any single EU member state's rules and regulations it can be transshipped and sold in all other EU member states. However, approval by the Supreme Chemical Committee (SCC), General State Chemical Laboratory, is needed when a food product does not correspond to Food Code specifications, in accordance with SCC Decision 366/97, Official Journal of the Greek Republic 597/B/17.7.97, and in cases where preparation, processing and packaging use one of the following:

- a) Additives such as antioxidants, colours, emulsifiers, stabilizers, gelling agents and thickeners, flavourings, preservatives, sweeteners, enzymes that are not listed in EU Regs 94/34, 94/34 and 95/2;
- b) Materials and objects that will come into contact with foods, substances or materials and are not included in the Greek Food Code list of allowed materials;
- c) New techniques and technologies prohibited by the Food Code;
- d) Novel foods or new ingredients;
- e) Foods enriched with nutritional elements (vitamins, traces, aminoacids)

SCC approval is granted on application and the procedure takes approximately 3 months for products already circulated in other EU member states, and 5 months for new to EU products.

Greece has been in compliance with EU Regs 1829/2004 and 1830/2004, and requires all foods and feeds containing GMO ingredients, either detectable or non-detectable, to be labeled accordingly.

Exporters are advised to have an experienced agent or joint venture partner, with a suitable background, experience and extensive sales/services network, who can offer full support to the end-user. The Greek importer has the responsibility for the marketability of any imported products into Greece. The importer is responsible for any violations of the Greek Food Code and is the person who is prosecuted in case of failure to observe food laws.

SECTION II. LABELING REQUIREMENTS

A. General Requirements

All imported food products should comply with the Greek Food Code. Missing a required indication stated in the Greek Food Code prohibits a good from being sold in the Greek market. Greece requires that labels be in the Greek language. Multi-language labels are acceptable. Stick-on labels are accepted. Sample size products should bear the "Not for Sale" indication.

Labeling, presentation and advertising foodstuffs applies for retail sale as well as hotels, restaurants, hospitals and other institutional establishments. Labeling, including picture or symbol referring to and attached to a foodstuff, must not deceive the consumer as regards its characteristics, attribute characteristics to the product which does not have, present a common characteristic as unique, or attribute preventative or therapeutic properties to the product. Indications such as "No colours", "No preservatives" or similar should appear on the product only if the products do not contain such substances in raw materials, or do not proceed from production process, manufacturing process, addition or residues.

Labeling should not attribute to foodstuffs capacity to preventing, treating or cure human diseases. This rule does not apply to dietetic foods and natural mineral water.

The following information is compulsory for all foodstuffs and should appear on the label:

Product name: This may be either a name or a description. The product name cannot be replaced by a commercial or industrial mark or by commercial nomenclature. The product name should contain or be accompanied by the nature of the product (i.e. powder, frozen) if the omission of this indication may confuse the consumer. Irradiated foodstuffs should be marked accordingly.

List of ingredients in descending order by weight: A list of ingredients, including additives used for the production of the product, which exists in the end product. The list should start with the word “ingredient”. In mixtures of vegetables and/or fruits containing equal quantities of vegetables and fruits, vegetables and/or fruits can be listed in random sequence. List of ingredients is not necessary for fresh fruits and vegetables, carbonated beverages, vineyard, cheese, butter, milk in ferment, products consisted of a single ingredient under the condition that the product name is the same with the ingredient. Certain ingredients may be named by the name of their category group rather than the specific name. These include refined vegetable oils excluding olive oil, refined fats, flour blends, starch, fish, cheese, spices, herbs, gum bases, crumbs, sugar, dextrose, glucose syrup, milk protein, cocoa butter, crystallized fruits (not exceeding 10% of the product's weight), vegetable mixes (not exceeding 10% of the product's weight), and wine.

Quantitative ingredient declaration: The quantification of an ingredient or a group of ingredients used for the production of the product is stated if the ingredient is present in the name of the product.

Net quantity of prepackaged food: The net quantity of prepackaged foods is expressed in metric units (liter, centiliter, milliliter, kilogram, gram). For pre-packed products that are sold by piece, the indication of the net quantity is not necessary if the items included in the package can be easily counted or if the number of pieces is stated on the label.

Shelf-life date – Expiration date: This can either be written as “Best until” or “Best before”. The date should include in order day, month, year. Declaration of minimum shelf-life is not necessary for fresh fruits and vegetables (including potatoes), vins de liquers, alcoholic beverages of more than 10% alcohol, non-alcoholic beverages packaged in more than 5 liters packages destined to the hotel, restaurant or institutional (hri) sector, bakery products, vineyard, salt, crystal sugar, chewing gums and portioned ice cream.

Storage and usage conditions: Instructions of use when needed to ensure proper use of the product.

Alcohol content: Alcoholic beverages under tariff codes 22.04 and 22.05 containing more than 1.2% alcohol need to be shown as “Alcohol (or alc.) ...% VOL”. The alcohol content is measure at 20 degrees Celcius.

Producer's or Packer's or Importer's name and address in any EU member country

Country of Origin of the Product: This can either be the country of production or origin of the product, according to EU regulations.

Lot identification: Lot here is used to identify products produced, processed and packaged, in similar conditions. The letter L precedes the lot number except in the cases where it is clearly distinguishable from other indications stated on the label. The lot number should be evident and visible (color fast). The lot number is assigned by one of following persons, who need to be located within an EU country: The producer, the processor, the packer or the initial vendor of the product.

B. Requirements Specific to Nutritional Labeling

Nutritional labeling in Greece is optional. However, it is required when nutritional value is presented or advertised (EU Directive 90/496) in order to prevent misleading information on labels.

Nutritional information, if provided, must provide information from Groups 1 or 2 in the following order:

Group 1	Group 2
Energy value Amount of proteins Carbohydrates Fats	Energy value Amount of proteins Carbohydrates Sugar Fat Saturates Fibre Sodium

When the nutritional claim relates to sugars, saturated fatty acids, fibre or nitrates Group 2 information is to be provided.

Nutritional labeling may include quantities of:

- Starch
- Polyalcohol
- Hydrocarbons
- Fats
- Cholesterol
- Vitamins and
- Inorganic acids

Statement of energy and nutrient content is numerical and in specific units per 100 grams or 100 milliliters. Units used in the label are: Energy: Kj and Kcal; proteins, hydrocarbons, fats, fibre, sodium in grams; cholesterol in milligrams, vitamins and inorganic acids may also state their recommended daily intake.

Nutritional labeling must be presented in Greek also in tabular form with the numbers aligned and if space does not permit this form, linear form is accepted.

Declaration of a product as “low in hydrocarbons and/or sugars” is allowed if the content in absorbable carbohydrates is less than 0.25%. Declaration of a product as “reduced calories” is allowed if the calories are reduced by at least 30% compared with the original foodstuff. This category covers products such as “light”, “line” or “slim”. Declaration of a product as “low in calories” is permitted if a single intake yields a maximum of 15 calories to the body and 30 calories as the daily intake.

Dietetic Foods - Special Food Products

Foodstuffs for infants, and people with health problems fall under this category. These products in addition to the regulations pertaining to regular foodstuffs need to specify for what group of people they are intended, in addition to caloric value and nutrient content. Foodstuffs included in this category are:

- Baby foods
- Milk for babies
- Low calorie products to control weight
- Food for diabetics
- Low sodium foods including low/no sodium salt
- Non-gluten foods
- Special foods for athletes
- Other food products of special medical purposes

Every declaration or advertisement for dietetic products must be explicit. The National Pharmaceutical Organization (EOF) is the responsible agency to impose and implement regulations on dietetic foods and food supplements.

SECTION III. Packaging and Container Regulations

Foodstuff packaging must guarantee that the product is protected against all external influences. Packaging is to be carried out under strict conditions of cleanliness with only approved materials. The composition of food packaging material must not influence or be influenced by the foodstuff, not cause changes in smell, taste or the appearance of the foodstuff and not transmit harmful substances.

Regulations for materials in contact with food have been EU-harmonized and Greece complies with EU Reg 89/109, specifying the common rules for materials that come into contact with foodstuffs. Materials must bear either an indication “for food use”, or a specific symbol designed in Council Directive 80/590/EEC. For additional information please see www.useu.be/agri/packaging.html.

SECTION IV. FOOD ADDITIVE REGULATIONS

A food additive is any substance, not used as an ingredient, irrespectively of nutritional value, added to a food for technical reasons, as an effective constituent directly or indirectly. An additive is allowed only when proved advantageous for the consumer. To determine possible unfavorable effects, additives are subject to appropriate tests and toxicological evaluation, including cumulative effects. Food additives should be clearly visible on the product label.

The Greek Food Code is governed by EU regulations on food additives. The Greek Food Code and EU prohibit the usage of food additives not listed in the following table:

Foodstuff Additive Categories

Coloring Agents	Sweeteners
Preservatives	Expansion Powder
Anti-oxidants	Anti-foaming agents
Emulsifiers	Coating materials

Emulsifying salts	Flour enhancing agents (improvers)
Coagulating substances	Hardeners
Coagulants	Hydroscopic agents
Taste enhancing agents	Blocking agents
Oxidants	Enzymes
Acidity correctives	Volume augmentation agents
Anti-coagulants	Propulsive and packing gases
Modified starches	

Food additives are placed in categories according to function, but may be used for other purposes. There are positive lists for additives, colorings and sweeteners that can freely be used in all foods, except for certain product categories (i.e. traditional products), and there are also some specific lists of preservatives, antioxidants and other additives which have limited use in certain food products. A list of allowed additives can be found in the Greek Food Code and can also be obtained by the General State Chemical Laboratory.

In consideration of scientific and technical progress, the SCC may allow use of an unlisted additive provided that a) permission is given for maximum of two years, b) the foodstuffs containing it will be subject to official control, and c) a special indication may be stipulated on the labeling. Prior to expiration of the two-year period, application may be made for listing the additive under procedures of EU Dir 89/107.

Foodstuffs in which a limited number of food additives can be used include:

- Chocolates and chocolate products
- Fruit juices and juice mixtures (including pineapple and grape juice)
- Marmelades and jellies
- Partially dehydrated milk
- Frozen, deeply frozen, chilled non-processed vegetables (including potatoes)
- Fruit compote
- Rice
- Fats
- Refined olive oil
- Ripened Cheese
- Mozzarella Cheese
- Canned fruits and vegetables
- Gehakt
- Pre-packed ground meat
- Bread
- Fresh pasta
- Wine
- Beer
- Butter
- Foie gras

SECTION V. PESTICIDE AND OTHER CONTAMINANTS

Maximum residue levels (MRLs) are set at the EU level. The Greek Ministry of Food and Agricultural Development, Plant Protection Division, monitors, enforces and is responsible for “risk assessments” of MRLs on fresh, unprocessed products as well as dairy and livestock products. Processed foodstuffs are monitored and enforced by the Food Control Agency (EFET).

Greece complies with following EU Directives and Regulations on MRLs:

90/642/EU for fruits and vegetables
86/362/EU for grains
86/363/EU for food products of animal origin
2000/24/EU - Amendment
2002/63/EU - Amendment

Please see www.europa.eu.int for a product list. For additional information on MRLs in Greece, please review GR4011, dated 7/14/04.

Pesticides need to be registered in the National Catalogue. In order for a pesticide to be approved and registered, an application must be turned in by the importer, to the Supreme Committee of Pesticides, Ministry of Food and Agricultural Development, requesting approval. Pesticide registration procedures take 2-5 years. Greece accepts WHO Codex International List.

SECTION VI. OTHER REGULATIONS AND REQUIREMENTS

Each EU member state is responsible for carrying out inspections on a regular basis. Random checks are performed at import or at later stages of trading. Imported foods are not subject to registration. Foodstuffs entering Greece for the first time are inspected to get approval. The ingredient list that must accompany the product is the one that determines its clearance and what duties imposed. The application for approval must include a statement indicating the name of the product, type of packaging, processing method, the exact composition of the product and food safety control methods used. If all are in compliance with Greek Food Code the product is granted clearance. The clearance procedure costs about €150 or approximately \$181 and is handled by an expediter.

Products including allowed additives not included in the catalogue, non approved packaging material, have used new technologies in the processing method, novel foods in accordance with SCC Decision 366/97, and foodstuffs enriched with nutritional elements must obtain approval from the SCC in order to be commercialized in Greece. The cost of this procedure is €320, approximately \$390. The procedure takes 5 months for products new to EU countries and 3 months for products already commercialized in other EU member states.

Specific agricultural and food products which are subject to inspection and to Greek trade restrictions include:

- **Poultry, Meat, Fish, Dairy, Egg:** Products of third country origin must originate from plants included in the list of EU approved plants.
- **Enriched/Bleached flour:** Greek regulations prohibit the import of any products made or including enriched/bleached flour.
- **Nuts:** Imported nuts are subject to a random aflatoxin test at entry stage or at selling points. At port, usually one out of ten containers are sampled to be tested for aflatoxin. Phytosanitary certificates for row nuts imported into Greece are required in accordance with EU legislation in effect.
- **Seeds:** Greek authorities require non-presence of transgenic material for imported cotton seeds, while for corn seeds the tolerance level set is 0.5% for EU approved corn varieties. Wheat seeds are checked for Karnal bant.

Food samples must undergo all hygiene or labeling requirements.

For additional information please refer to: <http://www.useu.be/agri/usda.html>

SECTION VII. OTHER SPECIFIC STANDARDS

- **Traceability and Labeling Requirements:** Greece is in compliance with EU Regs 1829/2004 and 1830/2004 which require all foods and feed containing biotech ingredients, either detectable or non-detectable to be labeled accordingly, without specifying the percentage of content. The allowable adventitious presence for EU approved varieties of genetically engineered substances for use in food and feed is set at 0.9%. Above this level, all products must be labeled as containing biotech. Meat, milk and other dairy products originating from animals fed with GM feed do not require biotech labels.
- **Consumer Packing:** In accordance with EU Reg 89/109; 16/2002; 2001/16/EU

SECTION VIII. COPYRIGHT/TRADEMARK LAWS

Greece's legislation on trademark/copyright is harmonized with EU legislation. The trademark in order to be registered, must be new (not previously used), with distinctive quality (not generic) and something not already in common usage.

SECTION IX. IMPORT PROCEDURES

Food products must conform to the regulations required by the Greek Food Code and EU legislation.

Food and beverage products of U.S. origin complying with EU rules and regulations would not require special permits (nor they are subject to special rules or regulations) for commercialization in Greece. However, biotech products, as previously discussed, are handled quite strictly. If a U.S. food product, other than food supplements, conforms to any single EU member state's rules and regulations it can then be transshipped and sold in any other EU member state. For additional information on EU Import Regulations and Procedures, please refer to: www.useu.be/agri/label.html.

Food products entering Greece are examined upon their entry by Customs Authorities (Port Customs Authorities, Health Authorities) who inspect the import documents. Health authorities may perform tests and relative analysis of samples. Import procedures can be completed and the product may enter the market within 48 hours from the time of arrival at port if no specific problems arise from the import inspection. Health certificates accompanying foodstuffs must in the Greek language.

To enter the Greek market, it is very important to have an agent or joint venture partner, with a suitable background, who would handle all importing procedures.

APPENDIX I – GOVERNMENT REGULATORY AGENCY CONTACTS

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APPENDIX II. OTHER IMPORT SPECIALIST CONTACTS

Partial list of accredited laboratories

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